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July 12, 2024

VIA ECF

Honorable Michael A. Hammer
United States Magistrate Judge
United States District Court for the District of New Jersey
Martin Luther King Jr. Building & Federal Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *NECA LLC, et al. v. Jazwares, LLC, et al.,*
Case No. 2:23-cv-03863-SDW-MAH

Dear Judge Hammer:

This firm represents Plaintiffs NECA LLC and Kidrobot, LLC (“Plaintiffs”) in the above-captioned matter. We write jointly with counsel for Defendants Jazwares, LLC and Kelly Toys Holdings, LLC (“Defendants”) pursuant to the Court’s instructions at the June 28, 2024 status conference and the June 28, 2024 text order (Dkt. No. 39).

Plaintiffs and Defendants request a two month extension of the deadlines to complete (1) fact discovery, (2) affirmative expert reports, (3) rebuttal expert reports, and (4) expert discovery. The current deadlines are as follows:

- (1) August 2, 2024 to complete all fact discovery;
- (2) September 6, 2024 to deliver all affirmative expert reports;
- (3) October 7, 2024 to deliver all rebuttal expert reports; and
- (4) November 8, 2024 to complete expert discovery, including the depositions of any expert witnesses.

The parties’ request that the above deadlines be extended as follows:

- (1) October 2, 2024 to complete all fact discovery;
- (2) November 7, 2024 to deliver affirmative expert reports;
- (3) December 9, 2024 to deliver all rebuttal expert reports; and

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(4) January 17, 2025 to complete all expert discovery, including the depositions of any expert witnesses.

Furthermore, the parties propose that the next status conference in this matter be held on or about August 26, 2024.

Attached to this letter is the parties' Proposed Second Amended Scheduling Order which sets forth the proposed new deadlines, as well as the proposed date for the next status conference. Should the Proposed Second Amended Scheduling Order be acceptable to Your Honor, the parties respectfully request that Your Honor enter it on the docket. We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott S. Christie", with a long horizontal flourish extending to the right.

Scott S. Christie